

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

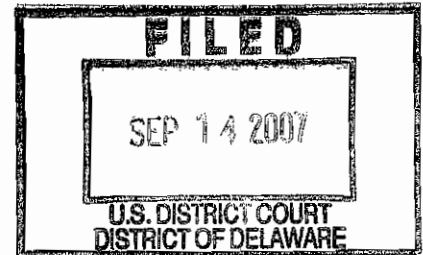
Cathy D. Brooks-McCollum  
& On behalf of  
Emerald Ridge Service Corporation Derivative Action  
As a Director  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241  
(PLAINTIFF)

CIVIL ACTION NO: 04-419 (JJF)

JURY TRIAL REQUESTED

vs.

State Farm Insurance Company  
(DEFENDANTS)



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CURRENT DISCOVERY DELAYS RELATED TO THIS CASE

Plaintiff submitted the attached Interrogatories upon various individuals, as well a request for Production of Documents several times. Therefore, Plaintiff is asking the court should these items not be complied with per the Courts Order by October 9, 2007 to issue an Order instructing each party which Interrogatories they must comply with, and the documents they must turn over to Plaintiff.

Plaintiff has issued the attached Subpoena, as well as the one to Wachovia Bank to turn over Corporate documentation, which are not afforded Attorney Client Privilege, in that Plaintiff is and has been determined to have been a valid Stockholder and Director, in addition to the parties never claimed they did not commit crimes in obtaining the documents, but merely have argued immunity, this takes away any privilege obtained between Attorney Kafader, Gouge and the other parties who participated along with Defendants in these pleadings.

Plaintiff previously submitted other discoverable items to the court regarding admissions and Request Of Production of Documents, Depositions, etc. of which Plaintiff requests the court to issue an Order on should they too not be fully complied with.

Submitted,

A handwritten signature in black ink, appearing to read "Cathy D. Brooks-McCollum".

/s/ Cathy D. Brooks-McCollum  
PO Box 12166  
Wilmington, DE 19850  
August 15, 2007

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Cathy D. Brooks-McCollum  
& On behalf of  
Emerald Ridge Service Corporation Derivative Action  
PO Box 12166  
Wilmington, DE 19850  
As a Director  
**(PLAINTIFF)**

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State Farm Insurance Company  
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**PROOF OF SERVICE**

I Cathy D. Brooks-McCollum hereby certify that on the 13<sup>th</sup> day of September 2007, I will and have caused to be served a true and correct copy of the foregoing two Motion electronically upon defendants:

Casarino, Christman & Shalk  
Stephen P. Casarino  
800 North King St, Suite 200  
P.O. Box 1276  
Wilmington, DE 19899  
(302) 594-4500  
(302) 594-4509 Fax

  
/s/ Cathy D. Brooks-McCollum (Pro Se)  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241

PO BOX 12166  
Wilmington, DE 19850

U.S.M.S.  
K.R. 9/1



United States District Court  
844 North King Street  
Lock box 18  
Wilmington, DE 19801